

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, JUSTIN BALDONI,
JAMEY HEATH, STEVE SAROWITZ, IT ENDS
WITH US MOVIE LLC, MELISSA NATHAN, THE
AGENCY GROUP PR LLC, and JENNIFER ABEL,

Defendants.

x

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: Civ. Action No. 1:24-cv-10049-LJL

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: Related to:

: Civ. Action No. 1:25-cv-00779-LJL

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x

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DECLARATION OF ELLYN S. GAROFALO IN SUPPORT OF THE WAYFARER PARTIES' LETTER MOTION TO QUASH BLAKE LIVELY'S DOCUMENT SUBPOENA TO HARCO INSURANCE COMPANY

I, Ellyn S. Garofalo, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner with the law firm Liner Freedman Taitelman + Cooley, LLP, attorneys of record for Wayfarer Studios LLC, It Ends With Us Movie LLC, Justin Baldoni, Jamey Heath, and Steve Sarowitz (the "Wayfarer Parties").
2. Attached hereto as Exhibit A is a true and correct copy of a subpoena Plaintiff Blake Lively served on Harco Insurance Company (the "Harcos Subpoena").
3. Attached hereto as Exhibit B is a true and correct copy of Lively's First Set of Requests for Production to Wayfarer Studios LLC. Request 29 seeks "All applicable insurance agreements under which any insurer may be liable to satisfy all or any part of any judgment which may be entered in this action or to indemnify or reimburse payments made to satisfy all or part of any judgment." The Wayfarer Parties produced the applicable insurance policies, including the policy issued by Harco Insurance Company.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 13, 2025
Los Angeles, CA

By: /s/ Ellyn S. Garofalo
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